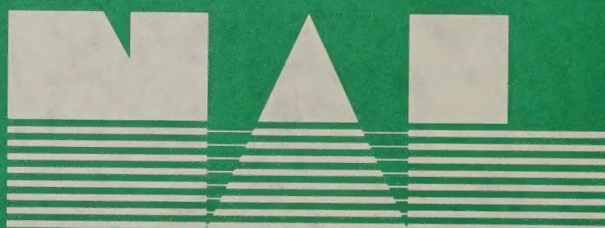


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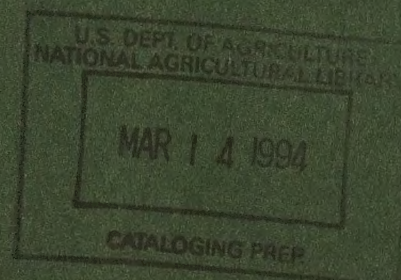
United States
Department of
Agriculture

Extension
Service

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Plans and Procedures for Program Participation Data and Information Collection in the Cooperative Extension Service

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U.S. DEPARTMENT OF AGRICULTURE
EXTENSION SERVICE

Plans and Procedures
for Program Participation Data
and Information Collection
in the
Cooperative Extension Service

SECTION A - INTRODUCTION

I. Responsibility

The Extension Service, administering benefit programs that are subject to the U.S. Department of Agriculture (USDA) nondiscrimination policy in 7 CFR 15, is responsible for providing for the collection of program participation data and information from State Cooperative Extension Services. The data and information should be of a level of sufficiency in order to comply with the Department's civil rights rules and regulations, and to permit effective enforcement of Title VI of the Civil Rights Act of 1964 as well as other nondiscrimination statutes.

II. Policy And Objectives

The purpose and objective for collection of program participation data is defined broadly in the U.S. Department of Agriculture's Administrative Regulations, Title 9, Equal Opportunity, Chapter 2, Section 1, paragraph 21.A, as follows:

"Each agency that administers programs subject to 7 CFR 15, Subpart A or B, will develop a system for establishing base data that identifies eligible populations and measures delivery of program benefits in order that the quantity and quality of benefits and services delivered to minority individuals can be documented and compared to benefits delivered to nonminority individuals..."

Collection of program participation data and information is a strong ally and useful tool for program building. The data may serve as an important index for Extension workers to evaluate participation by various clientele groups in Extension educational programs and activities as well as an evaluation of the extent of conformance to equal opportunity objectives. The data and information can be of significant value to Extension in spotting and correcting program and administrative weaknesses.

The purpose of these procedures is to prescribe optional administrative instructions for States in collection and reporting of program participation data. The intent of the options is to provide for collection of data that can be used in planning Extension programs.

- I. "Contact participation" refers to the coming together of two or more individuals face-to-face to participate in an educational experience or conduct Extension-related business. Contact participation occurs in conferences, consultations, workshops, seminars, and similar activities in which the mission and business of a State Cooperative Extension Service are carried out. 2/
- J. "Enrollment data," for reports to ES-USDA refers to and shall consist of eligible persons whose names have been placed on a register or who have been enrolled in a course, workshop, or short-term program activity. 3/

2/ The intent here is to identify persons whose race and sex are visibly discernible and who have personal involvement in Extension programs. When reporting contact participation data to ES-USDA, a State Cooperative Extension Service need only determine first that a contact is direct or indirect and then report only direct contacts to ES-USDA. A direct contact is one made without the aid of a transmitting agent or device; such as telephone, electronic media, or newsletter. In a direct contact, the educational course is a straight line (linear) without any deviation or intervention between the educator and the client or participant. Data on indirect contacts made by circular letters, newsletters, radio, television, telephone, and so on, may be collected by States if desired. However, they should not be included with direct (face-to-face) participation contact data submitted to ES-USDA. Words and phrases to bear in mind when defining contact participation are visibly discernible, face-to-face, and direct or indirect.

3/ Includes, but not limited to, such activities as 4-H Youth Camp enrollment, EFNEP Homemaker enrollment, and enrollment or signup information for participation in study groups, workshops, seminars, and/or demonstrations. Program activities are short-term and generally lack fixed organizational structure and officials.

- K. "Membership data," for reports to ES-USDA, refer to and consist of information on persons who belong to, or have membership in, a structured club, unit, committee, or council of the State Cooperative Extension Service. 4/
- L. "Parity of Participation" refers to a condition in which the percent distribution of program participants (beneficiaries) is proportionate to, or within reasonable limits of (± 2 -.0 percentage points), their respective percent distribution in the potential recipient audience/population. 5/

IV. Major Compliance Requirements

The Department's regulations identify requirements of data and information which must be met and implemented by State Cooperative Extension Services to assess compliance with the intent of nondiscrimination statutes. These major requirements are set out as follows:

- A. Identify Extension clientele in the population eligible to participate in Extension programs and activities, using the best available data.
- B. Establish program participation targets in Extension annual Plans of Work.
- C. Incorporate specific program targets for the delivery of Extension educational benefits and service areas of underrepresentation in clientele groups.
- D. Promote parity of participation in Extension programs by underrepresented racial group members.
- E. Provide approved eligible targets against which Extension performance can be measured.
- F. Collect data for all counties in which the State Cooperative Extension Service program operates.

4/ The unit of members is considered to have officers and regular/periodic meetings, generally at some permanent or fixed location. There is permanency to the business agenda, objectives, and goals of the structured unit. Examples include 4-H Youth organized clubs, Extension Homemakers Clubs, planning and advisory committees, and review and expansion committees.

5/ The intent is to identify and assess proportionate representation, using the potential (eligible) recipients as a base. A treatment of the data involves a simple comparison of actual or projected contact participation to potential.

- G. Obtain race and sex data on all significant aspects of program participation, including participation in local committees and advisory groups, of persons intended to benefit from Extension programs and services.
- H. Base data on renewable records -- an auditable trail.
- I. Review each program within the Extension reporting year to evaluate clientele participation and the extent of conformance to equal opportunity objectives and measurable targets.
- J. Submit annually, to ES-USDA, a report reflecting program participation data by race and sex. Explain any apparent inequities in delivery of program benefits and list specific action taken to ensure equal opportunity.

V. Eligible Participants and Beneficiaries

Many data elements or types of data are necessary to document civil rights compliance and maintain an auditable trail of progress in program delivery. Focal points of civil rights analysis, as mandated by law, are: (1) eligibles -- persons eligible for program services and benefits, and (2) beneficiaries -- persons receiving program benefits and services. Other issues relating to benefits and services -- when, where, and how serviced, and the quantity -- are important to the extent that they provide information about the key factors or focal points: eligibles and beneficiaries.

Differences in the service delivery modes and the manner in which Extension conducts daily business augment and compound the assessment issue. Extension programs for which participation data will be collected include the following:

Structured Clubs	Advisory and Planning Committees
Seminars	Community Groups/Leaders/Committees
Agribusiness Meetings	Special Interest Groups
Workshops, Training	Families
Sessions	Study Groups
School Clubs	

Where a wide array of service delivery modes exists, the sufficiency of two broad categories of data (eligibles and beneficiaries) becomes questionable. Quality of service and benefits is not known because eligibles and beneficiaries indicate only quantity of participation. Relying on the good faith efforts of State Cooperative Extension Services to monitor and evaluate quality as well as quantity of program services and benefits, States will continue to collect and submit baseline data pursuant to USDA regulations. The States will report data on the following:

- A. The number and percent of persons eligible to participate in Extension programs and related activities (Potential Recipients).

- B. The number and percent of persons participating and thereby receiving the benefits and services from Extension programs and related activities (Beneficiaries/Clientele).

The States are encouraged to consider and include pertinent qualitative aspects of program benefits and services to minorities in their State impact studies.

VI. Collection of Additional "Other" Data and Information

With the increasing attention being given to the rights of the handicapped, elderly individuals, and other minority groups, Extension must be able to cite the extent to which these groups are receiving the benefits of Extension programs and services. State Cooperative Extension Services are not required, however, to collect and report participation data on handicapped and "senior citizens" benefiting from Extension programs and services.

In response to the mandates of external regulatory agencies, Extension could need to meet additional civil rights data collection and reporting requirements. Requirements of this kind, however, are usually met on a one-time basis, as requested.

VII. Collection of Program Participation Data by Sex

Title IX of the 1972 Education Amendments is the first comprehensive Federal law to prohibit sex discrimination in the participation and treatment of beneficiaries of educational programs and activities receiving or benefiting from Federal funds. The intent of the law is to eliminate sex discrimination in the programs, policies, and administration of educational institutions. It reads:

"No person in the United States, shall, on the basis of sex, be excluded from participation in, be denied the benefits of or be subjected to discrimination under any education program or activity receiving Federal financial assistance."

In consideration of the requirements to assure nondiscrimination with the above provisions, State Cooperative Extension Services will provide for the assessment of compliance in policies, program participation, and the delivery of program benefits. Hence, the procedural instructions under Section B will be applicable in the collection and reporting of program participation data by sex.

It is necessary that State Cooperative Extension Services be able to cite the extent to which men and women are receiving the benefits of Extension educational programs. The provisions under Section B provide for the information necessary for evaluative interpretation of compliance. The sex data obtained on all significant aspects of Extension programs should record the total number of participants by major program area.

SECTION B - DATA COLLECTION
AND REPORTING OPTIONS

I. Option I - Counties With 200 or Fewer Minority Group Members

A State Cooperative Extension Service need not require counties with a racial minority population of 200 or fewer to collect and/or report contact participation data for ES-USDA. County estimates of minority population (200 or fewer inhabitants) should be based on the latest U.S. Census of Population. In lieu of collecting and reporting contact participation data, each county so excluded will carry out the following provisions to assure that minority group members are well-informed of Extension programs and educational opportunities:

- A. Take specific action to advise racial minority group members of Extension educational program availability and the intent for nondiscrimination. Make personal contact with minority group members and leaders to inform them of programs and to encourage their active participation.
- B. Assure that minority group members are aware of, as well as have their name on, Extension mailing lists to receive information on program activities.
- C. Take specific action to extend invitations, through letters, personal contact, and newspapers, to minority group members to attend and participate in scheduled educational programs and activities.
- D. Direct information on programs and activities to sources of business and social contacts of minority group members.
- E. Identify and use mass media outlets which disseminate information to minority group members.
- F. Maintain documentation of efforts to involve minority group members.

A State Cooperative Extension Service electing to use Option I should make its plans known to ES-USDA on the Notification Statement Form. In addition, ES-USDA should be informed of the counties (names and numbers) determined to have fewer than 200 racial minority inhabitants.

6/ Counties so excluded (200 or fewer) will continue to collect and maintain program participation data by sex.

II. Option II - Exemption From Reporting Participation Contacts of Major Programs With Membership or Enrollment

This option is intended to reduce resources in civil rights reporting and to eliminate duplicative reporting in some program areas; for example, 4-H Youth Clubs and EFNEP. Programs having a structured membership or enrollment feature will be exempt from reporting participation contacts. Either membership/enrollment or contact participation data is a sufficient barometer for evaluation of agency civil rights status. Hence, 4-H Youth program participation contacts should not be reported to ES-USDA.

States selecting Option II will collect and submit to ES-USDA race/ethnic and sex data from all reporting counties/units as follows:

A. Potential Recipients

4-H Youth
Home Economics
Agriculture/Natural Resources
Community Development

B. Enrolled EFNEP Homemakers and Aides

States participating in the EFNEP program and reporting pertinent data on the ES Form 255 will continue to do so. The information reported shall be sufficient to conduct an effective evaluation of compliance with the requirements in the Department's rules and regulations. Hence, State Cooperative Extension Services need not require the collection and reporting of EFNEP contact participation data.

C. Membership and Participation of 4-H Youth and Adult Leaders

The collection and reporting of program participation data by race and sex pursuant to the requirements in the 4-H Enrollment Report (ES-237) are of a level of sufficiency to permit for evaluation and determination of 4-H compliance with the conditions required in the Department's civil rights regulations. Thus, States need not require 4-H to collect and report contact participation data.

D. Membership of Extension Homemakers Clubs

Organized Homemakers Clubs
Organized Homemakers Study Groups

E. Actual and Projected Participation Contacts

Agriculture/Natural Resources
Community Development
Home Economics (excluding EFNEP homemakers and aides)

III. Option III - Rotational Reporting - Contact Participation

Rotational reporting under this option refers to the systematic rotation of data reporting responsibilities among counties within a State. Counties within a State are grouped according to some measure of commonality, and data collection and reporting are staggered among the groups over the course of a planning cycle. The time period selected for rotation may vary; however, a recommended time period would be 3 months.

Rotation is intended to minimize the reporting burden while maintaining State and local reporting capabilities. It is the position of ES-USDA that resources saved in the contact participation data collection and reporting process can be shifted, in part, to improve documentation, records maintenance, and self-evaluation of program activities.

States selecting Option III will collect and submit to ES-USDA race/ethnic and sex data as follows:

A. Potential Recipients

- 4-H Youth
- Home Economics
- Agriculture/Natural Resources
- Community Development

B. Enrolled EFNEP Homemakers and Aides

States participating in the EFNEP program and reporting pertinent data on the ES Form 255 will continue to do so. The information reported shall be sufficient to conduct an effective evaluation of compliance with requirements in the Department's rules and regulations. Hence, State Cooperative Extension Services need not require the collection and reporting of EFNEP contact participation data.

C. Membership and Participation of 4-H Youth and Adult Leaders

The collection and reporting of program participation data by race and sex pursuant to the requirements in the 4-H Enrollment Report (ES-237) are of a level of sufficiency to permit for evaluation and determination of 4-H compliance with the conditions required in the Department's civil rights regulations. Thus, States need not require 4-H to collect and report contact participation data.

D. Membership of Extension Homemakers Clubs

- Organized Homemakers Clubs
- Organized Homemakers Study Groups

E. Actual and Projected Participation Contacts
on a Rotational Reporting Basis

Agriculture/Natural Resources
Community Development
Home Economics (excluding EFNEP homemakers and aides)

Aside from the economy of reporting, two distinct advantages are associated with rotational reporting of counties within States:

- States have maximum flexibility in arranging their reporting requirements; and
- Reduced recordkeeping means more attention could be given to quality of information collected and reported.

The disadvantages of rotational reporting are few but real enough to require a strong show of good faith by the State Cooperative Extension Service in instituting and monitoring an effective rotational scheme. "Telescoping," the major disadvantage to rotational reporting, means that events involving minority participants are deferred until the months identified for reporting minority participation. The telescoping issue could be compounded further by the seasonality of Extension programs. Events occurring in nonreporting months would be lost, unless States or counties made special provisions to capture them. Adjustments so that high minority participation events or other special activities can be included in the State count submitted to ES-USDA would invalidate the use of this method.

SECTION C - OPERATIONAL PROCEDURES

I. General Procedures

All States will be allowed a maximum of 30 working days after receipt of this document to review the guidelines, examine the data collection and reporting options, make their option choice, and notify ES-USDA on the appended Notification Statement Form. All States must submit a Notification Statement to ES-USDA.

- A. Upon receipt of a State's Notification Statement in ES-USDA, Extension staff will contact participating States (including deferred participants) to acknowledge receipt of the Notification Statement and arrange for the development, submission, and approval of a plan for implementing the selected data collection and reporting option.
- B. States selecting Option III will prepare an implementation plan including a rotation scheme and weighting procedure.
- C. A complete rotational cycle shall not exceed a period of 4 years.
- D. Implementation plans must be submitted to ES-USDA for evaluation and approval.
- E. Implementation plans will be approved in writing and returned to the participating State.
- F. The selected option will become operational upon receipt of an approved implementation plan.

States which decide to rotate reporting of contact participation data have the responsibility to develop and submit to ES-USDA, for approval, a rotational scheme plan prior to system implementation. The plan for rotational reporting must include a description of: (1) the rotational scheme to be used, (2) a chart showing when each county or reporting unit will report participation data, (3) the criteria for grouping counties, and (4) a brief narrative statement of anticipated data distortion possible in estimating total annual participation when rotational reporting is used. (See Exhibit B for example of a rotational reporting scheme.)

II. Base-Year Data

The use of base-year data would improve the credibility of a rotational scheme. The base-year data would furnish an empirical basis for adjusting counts obtained under a rotational system. This feature would limit the amount of subjectivity which could enter the data adjustment/weighting process. Existence of base-year data would provide a benchmark for comparing the results obtained during years of full and partial reporting.

States should consider the comparison of data reporting for a month in the base year with that being reported by the same county and same month of rotated collection. If the count of minority participation differs consistently by a fixed amount, the State may initiate its own review.

III. Weighting Participation Data

A weighting technique may be used to minimize distortion of numbers collected on less than a full count. The simplest weighting technique is to multiply the count obtained by the inverse of the rotational fraction. In a rotational scheme wherein counties report 3 months out of 12, the weighting factor would be twelve-thirds or four. Applying the weighting factor to the 3-month count of minority participation, the procedure would be as follows:

A Sample Weighting Technique

	Minority Participation <u>7/</u> (unweighted)	Weighting Factor	Minority Participation <u>8/</u> (weighted)
Black <u>9/</u>	25	X4	100
Hispanic	10	X4	40
Asian/Pacific Islander	5	X4	20
American Indian/ Alaskan Native	5	X4	20
White	55	X4	220
Total	100		400

While contacts are weighted upward to approximate the full annual count, the weighting does not affect the relative preponderance of contacts made. For example, Blacks constitute 25 percent of the total contacts, whether weighted or unweighted.

This simplest of weighting techniques is not recommended. Minorities are not distributed evenly across counties, and events attracting minorities are not distributed evenly across the months. The example does, however, clarify any misconceptions that weighting would disturb the relative importance of the less than full year participation count.

- 7/ Count obtained during the 3 months of reporting.
8/ Estimated total annual minority participation.
9/ Not of Hispanic origin.

An alternative procedure would be to weight each county's count for the months in which records are maintained by the inverse of the fraction for which those months represent a total year's count. For example, let's assume that County Z contacted 25 Blacks during January, May, and September. On that basis, the estimated number of Blacks contacted this year would be 25×4 or 100.

Adjustment procedures described are arbitrary; that is, nonstatistical in character. There is no one single correct statistical formula which can be applied, as in the case of sampling weights. Different procedures can be devised and subjected to tests of reasonableness. To discourage questionable data adjustment practices, States must describe and illustrate their weighting procedures and gain ES-USDA approval prior to putting a rotational reporting system into operation.

IV. State Notification and Selection of Option

Beginning on or before December 1, 1983, States will identify the option for collection of program participation data and information. At the end of the reporting period, September 30, 1984, States should submit program participation data by race and sex to ES-USDA as part of their Annual Civil Rights Report, as specified in the Extension Accountability and Evaluation System.

Each State should use Exhibit A to notify ES-USDA of its option.

PARTICIPATION STATUS
NOTIFICATION STATEMENT

We have reviewed the guidelines for minimum level data reporting to ES-USDA and have selected for the 1984-87 planning cycle the following:

Check One

- (1) Option I-----☐
- (2) Option II-----☐
- (3) Option III-----☐
- (4) Complete (100.0%) Annual Data Collection and Reporting of
 Participation by Major Program Areas-----☐
- (5) Wish to Defer Selection of an Option Until 19__☐ ^{1/}

State_____

Institution_____

Contact Person_____

Telephone_____

For ES-USDA Use

Approved_____

Disapproved_____

^{1/} States desiring to defer selection of an option will continue to report 100.0% data until the specified date identified in Item 5.

SAMPLE OF A ROTATIONAL SCHEME

To facilitate use of the rotational reporting procedure, an illustration is provided based on a hypothetical State.

CASE:

- A State Cooperative Extension Service has 24 counties.
- Of the 24 counties, three (3) counties have less than 200 minority inhabitants and are, therefore, exempt from reporting contact participation data.
- The remaining 21 counties are grouped according to some common attribute; such as size or geographic location.
- Groups of counties are established containing, as nearly as possible, equal numbers of reporting units:

Group A contains 5 Counties

Group B " " "

Group C " " "

Group D " 6 "

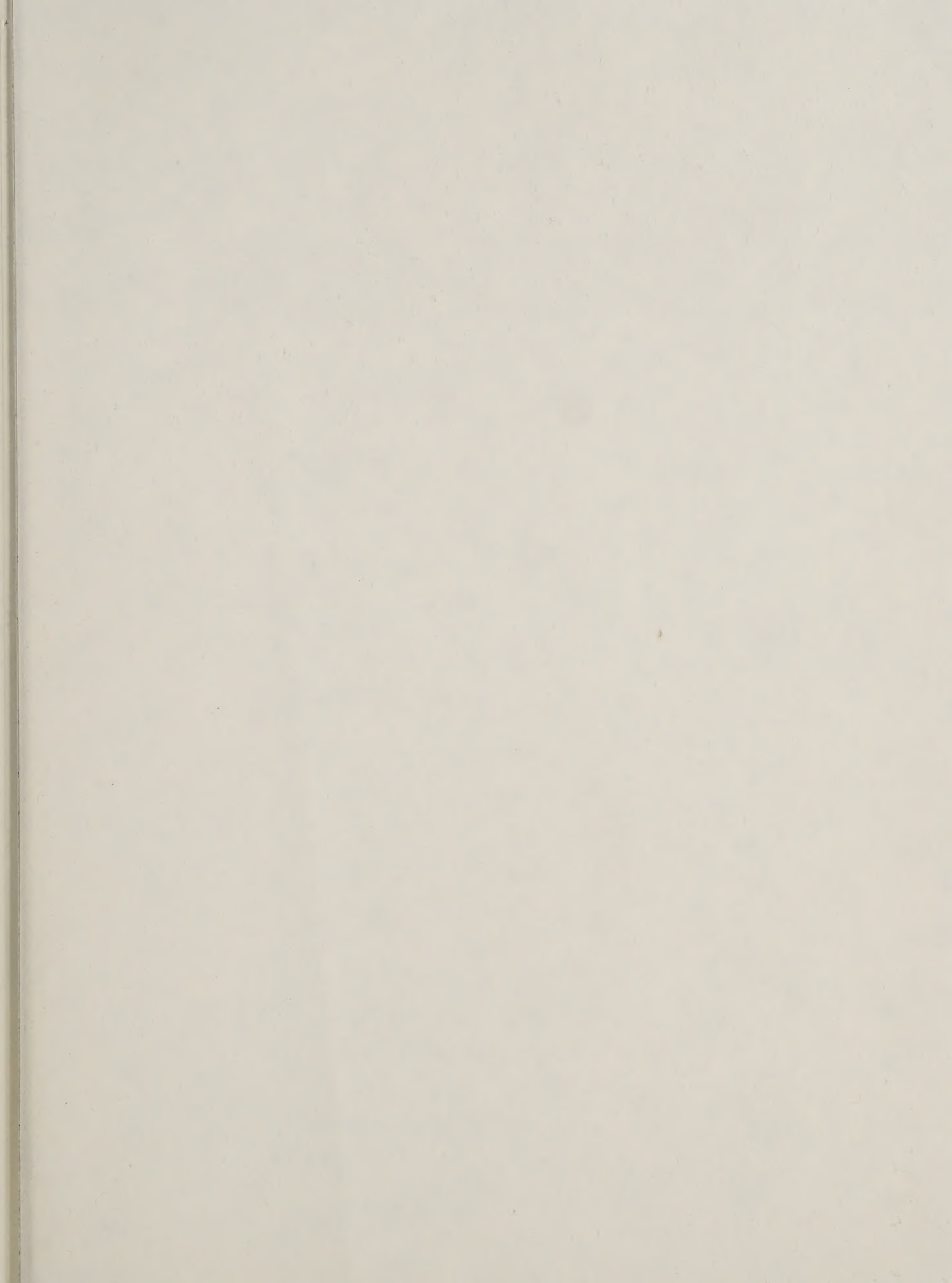
- Each group will report one (1) complete quarter (three (3) consecutive months) in each year of the 4-year cycle.
- Each group will report in a different quarter of each planning year.
- At the end of the 4-year planning cycle, each group of counties, A through D, will have reported four (4) quarters or one full year (see diagram on rotational scheme).

ILLUSTRATION

ROTATIONAL REPORTING SCHEME^{1/}

REPORTING COUNTY GROUPS	MONTHS AND QUARTERS												QUARTER
	JAN. FEB. MAR.	APR. MAY JUNE	JULY AUG. SEPT.	OCT. NOV. DEC.									
	1984 ROTATIONAL SCHEME												
A B C D	//////////	//////////	//////////	//////////	1 2 3 4								
GROUPS	1985 ROTATIONAL SCHEME												
A B C D	//////////	//////////	//////////	//////////	2 3 4 1								
GROUPS	1986 ROTATIONAL SCHEME												
A B C D	//////////	//////////	//////////	//////////	3 4 1 2								
GROUPS	1987 ROTATIONAL SCHEME												
A B C D	//////////	//////////	//////////	//////////	4 1 2 3								

^{1/} Whenever possible the rotational scheme should allow all county groups to report in four different quarters during the 4-year planning cycle. This procedure should net out or adjust for seasonal fluctuation resulting from periodic educational events.





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